Debbie Beadle

From:

Reid Brockway <waterat@comcast.net>

Sent:

Thursday, October 04, 2012 9:14 PM

To:

Debbie Beadle

Subject:

Materials submitted to tonight's PC meeting

Attachments:

Additional info on Aberdeens code.docx

Debbie,

The map I handed out to the Commissioners is available from the following link:

aberdeenwa.gov/maps/Map1a insert.pdf

I have attached the other one-page document, which I created, to this email.

Thanks, Reid

EXHIBIT NO. 224.







Additional information on Aberdeen's ECA code as regards buffers

Link to handout map: <u>aberdeenwa.gov/maps/Map1a_insert.pdf</u>

Link to Aberdeen's critical areas code: aberdeenwa.gov/code/Title 14

Notable features of Aberdeen's code related to buffer delineation

In 14.100.250, Wetland Buffers – Dimensions:

Buffers shall not include areas that are functionally and effectively disconnected from the wetland by a road or other substantially developed surface of sufficient width and with use characteristics such that buffer functions are not provided.

Streams are defined as "watercourses". Associated buffers are defined in 14.100.550, Fish and Wildlife Habitat Conversation Areas - Water Bodies – Buffers. Aberdeen uses the Water Type designations S, F, N_P, N_S, like Sammamish, but with expanded definitions for Type F, as follows:

Type F-A (>10 ft wide) 150 ft Type F-B (<10 ft wide) 100 ft

But there are special provisions for non-fish-bearing streams in existing subdivisions. Notably, section 14.100.550 starts with the statement:

The Director shall have the authority to require buffers from the edges of all streams in accordance with the following:

This is significantly different from an outright mandate of buffer widths by Type.

Then 14.100.550 goes on to state:

A. Buffers shall be established for activities adjacent to as necessary to protect the integrity, functions and values of the resource. Buffer widths shall reflect the sensitivity of the species or habitat *and the type and intensity of the adjacent human use or activity*. (emphasis added)

and

C. Buffers... shall not be extended across roads or other lawfully established structures or hardened surfaces that are functionally and effectively disconnected from the stream.